

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In re:

**Shanna Jeannine Richter**  
**David Michael Richter**Case No. **22-41874**CHAPTER 13 PLAN ☒ ModifiedDated: **February 28, 2025**

Debtor.

In a joint case, debtor means debtors in this plan.

**Part 1. NOTICE OF NONSTANDARD PLAN PROVISIONS, SECURED CLAIM LIMITATIONS, AND LIEN OR SECURITY INTEREST AVOIDANCE: Debtor must check the appropriate boxes below to state whether or not the plan includes each of the following items:**

1.1	A limit on the amount of a secured claim based on a valuation of the collateral for the claim, set out in Parts 9 or 16	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not included
1.2	Avoidance of a security interest or lien, set out in Part 16	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not included
1.3	Nonstandard provisions, set out in Part 16	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not included

**Part 2. DEBTOR'S PAYMENTS TO TRUSTEE: The initial plan payment is due not later than 30 days after the order for relief, unless the court orders otherwise.**2.1 As of the date of this plan, the debtor has paid the trustee \$ **12,560.00**.

2.2 After the date of this plan, the debtor will pay the trustee:

Plan payment	Start MM/YYYY	End MM/YYYY	Total
<b>\$300.00</b>	<b>03/2025 (10 months)</b>	<b>11/2025</b>	<b>\$3,000.00</b>
<b>\$2,110.00</b>	<b>01/2026 (23 months)</b>	<b>11/2027</b>	<b>\$48,530.00</b>
<b>TOTAL:</b>			<b>\$51,530.00</b>

2.3 The minimum plan length is ☒ 36 months or ☐ 60 months from the date of the initial plan payment unless all allowed claims are paid in a shorter time.2.4 The debtor will also pay the trustee **0.00**.2.5 The debtor will pay the trustee a total of \$ **64,090.00** [lines 2.1 + 2.2 + 2.4]**Part 3. PAYMENTS BY TRUSTEE AND TRUSTEE'S FEES:** Prior to confirmation of the plan, the trustee will pay from available funds payments designated as Adequate Protection ("Adq. Pro.") under Parts 8 and 9 to creditors with claims secured by personal property. All other funds will be disbursed by the trustee following confirmation of the plan as soon as is practicable. The trustee will pay from available funds only to creditors for which proofs of claim have been filed. The trustee is not required to retain funds for any claim for which a proof of claim has not been timely filed and may disburse those funds to other claimants. The trustee may collect a fee of up to 10% of plan payments, or \$ **6,409.00** [line 2.5 x .10]**Part 4. EXECUTORY CONTRACTS AND UNEXPIRED LEASES [§ 365]** — The debtor assumes the following executory contracts or unexpired leases. Debtor will pay directly to creditors all payments that come due after the date the petition was filed. Cure provisions, if any, are set forth in Part 7.

	Creditor	Description of Property
	<b>-NONE-</b>	

**Part 5. CLAIMS NOT IN DEFAULT** — Payments on the following claims are current. The debtor will pay directly to creditors all payments that come due after the date the petition was filed. The creditors will retain liens, if any.

	Creditor	Description of Property
5.1	<b>Lincoln Automotive Fin/Ford Motor Credit</b>	<b>2015 Ford Fusion 34000 miles Kelly Blue Book value used. Son pays for this vehicle.</b>

	Creditor	Amount of default	Monthly payment	Beginning in #mo./yr.	# of payments	Remaining Payments	+ amount paid to date by Trustee (mod plan only)	Total payments
6.1	<b>Guidance Res/US Bk</b>	<b>\$1,549.94</b>	n/a	n/a	n/a	<b>\$0.00</b>	<b>\$1,549.94</b>	<b>\$1,549.94</b>
TOTAL								<b>\$1,549.94</b>

	Creditor	Amount of default	Interest rate (if any)	Beginning in mo.yr	Monthly Payments	# of payments	Remaining Payments	+ amount paid to date by Trustee (mod plan only)	= Total payments
	<b>-NONE-</b>								
<b>TOTAL</b>									<b>\$0.00</b>

	Creditor	Est. Claim amount	Secured claim amount	Int. Rate	Adq. Pro. (Check)	Begin-ni ng in mo./yr.	Monthly payment	# of Payments	Remaining payments	+amount paid to date by Trustee (mod plan only)	= Total payments
8.1	Teacher Federal Cred U/TruStone Financia	\$9,811.59	\$9,811.59	9.00	<input type="checkbox"/>					\$5,445.20	\$11,232.18
						03/2025	\$175.36	33	\$5,786.98		
TOTAL										\$11,232.18	

	Creditor	Est. Secured Claim amount	Int. rate	Adq. Pro. (Check)	Beginning in mo./yr.	Monthly payment	# of Payments	Remaining payments	+amount paid to date by Trustee (mod plan only)	Total payments
	-NONE-			<input type="checkbox"/>						
TOTAL										\$0.00

**Part 10. PRIORITY CLAIMS (not including claims under Part 11):** The trustee will pay in full all claims entitled to priority under § 507(a)(2) through (a)(10), including the following. **The amounts listed are estimates.** The trustee will pay the allowed portion of the priority amount listed in the proof of claim.

	Creditor	Claim Amount	Beginning in mo.yr.	Monthly payment	# of payments	Remaining payments	+ amount paid to date by Trustee (mod plan only)	=Total payments
10.1	Attorney Fees (Post)	\$800.00	03/2026	\$800.00	1	\$800.00	\$0.00	\$800.00
10.2	Attorney Fees (Post)	\$500.00	11/2025	\$82.53	4	\$330.10	\$169.90	\$500.00
10.3	Attorney Fees (Post)	\$813.48	03/2025	\$86.53	8	\$692.35	\$121.13	\$813.48
10.4	Attorney Fees (Post)	\$806.70	n/a	n/a	n/a	\$0.00	\$806.70	\$806.70
10.5	Attorney Fees	\$3,052.65	n/a	n/a	n/a	\$0.00	\$3,052.65	\$3,052.65
10.6	Internal Revenue Service	\$1.00	12/2023	Pro Rata	Pro Rata	\$1.00	\$0.00	\$1.00
10.7	MN Dept of Revenue	\$1.00	12/2023	Pro Rata	Pro Rata	\$1.00	\$0.00	\$1.00
TOTAL								<b>\$5,974.83</b>

**Part 11. DOMESTIC SUPPORT OBLIGATION CLAIMS:** The trustee will pay in full all domestic support obligation claims entitled to priority under § 507(a)(1), including the following. **The amounts listed are estimates.** The trustee will pay the allowed portion of the priority amount listed in the proof of claim.

	Creditor	Claim amount	Beginning in mo./yr.	Monthly payment	# of payments	Remaining payments	+ amount paid to date by Trustee (mod plan only)	=Total payments
	<b>-NONE-</b>							
TOTAL								<b>\$0.00</b>

**Part 12. SEPARATE CLASSES OF UNSECURED CLAIMS** — In addition to the class of unsecured claims specified in Part 13, there shall be separate classes of non-priority unsecured creditors including the following. The trustee will pay the allowed portion of the nonpriority amount listed in the proof of claim. **All following entries are estimates.**

	Creditor	Undersecured claim amount	Interest Rate (if any)	Beginning in mo./yr.	Monthly Payment	# of Payments	Remaining payments	+ amount paid to date by Trustee (mod plan only)	= Total payments
	<b>-NONE-</b>								
TOTAL									<b>\$0.00</b>

**Part 13. TIMELY FILED UNSECURED CLAIMS** — The trustee will pay holders of allowed non-priority unsecured claims for which proofs of claim were timely filed the balance of all payments received by the trustee and not paid under Parts 3, 6, 7, 8, 9, 10, 11, and 12 their pro rata share of approximately \$ **38,924.05** [line 2.5 minus totals in Parts 3, 6, 7, 8, 9, 10, 11, and 12].

13.1 The debtor estimates that the total unsecured claims held by creditors listed in Part 8 and 9 are \$ **0.00** .

13.2 The debtor estimates that the debtor's total unsecured claims (excluding those in Part 8 and 9) are \$ **38,621.26** .

13.3 Total estimated unsecured claims are \$ **38,621.26** [lines 13.1 + 13.2].

**Part 14. TARDILY-FILED UNSECURED CREDITORS** — All money paid by the debtor to the trustee under Part 2, but not distributed by the trustee under Parts 3, 6, 7, 8, 9, 10, 11, 12, and 13, will be paid to holders of allowed nonpriority unsecured claims for which proofs of claim were tardily filed. Tardily filed claims remain subject to objection pursuant to 11 U.S.C. §502(b)(9).

**Part 15. SURRENDER OF COLLATERAL AND REQUEST FOR TERMINATION OF STAY:** The debtor has surrendered or will surrender the following property to the creditor. The debtor requests that the stays under §§ 362(a) and §§ 1301(a) be terminated as to the surrendered collateral upon confirmation of the plan.

	Creditor	Description of Property (including complete legal description of real property)
	<b>-NONE-</b>	

**Part 16. NONSTANDARD PROVISIONS:** The Trustee may distribute additional sums not expressly provided for herein at the trustee's discretion. Any nonstandard provisions, as defined in FRBP 3015(c), must be in this Part. Any nonstandard provision placed elsewhere in the plan is void. Any request by the debtor to modify a claim secured only by a security interest in real property that is the debtor's principal residence must be listed in this Part and the debtor must bring a motion to determine the value of the secured claim pursuant to Local Rule 3012-1(a).

<b>16.1</b>	<p><b>Debtors will retain all refunds.</b></p> <p><b>This is a 100% plan. Allowed general unsecured non-priority claims shall be paid in full. Debtors will not decrease the return to general unsecured creditors under any modified plans filed in this case.</b></p> <p><b>A proof of claim may be filed by the Internal Revenue Service (IRS) for a claim against the debtors for taxes that become payable to the IRS post-petition, limited to only the tax year for which the bankruptcy case was filed. The trustee shall pay such claim as submitted as funds are available pursuant to 11 U.S.C. Statute 1305.</b></p> <p><b>The debtor shall send the Trustee each year during the Chapter 13 Plan, copies of his/her federal and state income tax returns at the time they are filed.</b></p> <p><b>APPROVAL NOT REQUIRED TO INCUR POST PETITION DEBT.</b> Approval by the bankruptcy court, or Chapter 13 trustee, shall not be required prior to debtor incurring ordinary consumer debt while this case is pending. Letters of approval will not be provided by the Chapter 13 trustee and one is not needed for debtor to incur post-petition ordinary consumer debt in Minnesota. All parties in interest retain all rights regarding the treatment of this debt in future modified plans and motions to confirm such plans.</p> <p><b>Upon the granting of relief from the automatic stay, the trustee shall cease payments on account of the secured portion of the applicable claim. For any claim arising from the granting of relief from the automatic stay, surrender, foreclosure, repossession, or return of any collateral to any creditor listed in Parts 5, 6, 7, 8, 9, 10, and 16 or Non-standard provisions, for any reason, including plan modification, the trustee shall pay such claim as a general unsecured claim upon amendment of the applicable claim. Any alleged balance of any claim to such creditor shall be discharged upon the debtors receiving a discharge in this case.</b></p> <p><b>All secured creditors being paid direct (outside the Chapter 13 plan) on the plan shall, upon confirmation of the plan, send debtors monthly statements and are authorized to speak to debtor about post-petition payments.</b></p>
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#### SUMMARY OF PAYMENTS:

Class of Payment	Amount to be paid
Payments by trustee [Part 3]	\$ <b>6,409.00</b>
Home mortgages in default [Part 6]	\$ <b>1,549.94</b>
Claims in Default [Part 7]	\$ <b>0.00</b>
Secured claims subject to modification (cramdown) pursuant to § 506 [Part 8]	\$ <b>11,232.18</b>
Secured claims excluded from § 506 [Part 9]	\$ <b>0.00</b>
Priority Claims [Part 10]	\$ <b>4,974.83</b>
Domestic support obligation claims [Part 11]	\$ <b>0.00</b>
Separate classes of unsecured claims [Part 12]	\$ <b>0.00</b>
Timely filed unsecured claims [Part 13]	\$ <b>38,924.05</b>
<b>TOTAL (must equal line 2.5)</b>	<b>\$ 64,090.00</b>

#### Certification regarding nonstandard provisions:

I certify that this plan contains no nonstandard provision except as placed in Part 16.

Signed: /s/ Amanda M. Rosback  
**Amanda M. Rosback 0399772**  
Attorney for debtor

Signed: /s/ Shanna Jeannine Richter  
**Shanna Jeannine Richter**  
Debtor 1

Signed: /s/ David Michael Richter  
**David Michael Richter**  
Debtor 2 (if joint case)

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re:	Case No. 22-41874
Shanna Jeannine Richter	Chapter 13
David Michael Richter	
Debtor(s)	

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**DECLARATION OF MAILING CERTIFICATE OF SERVICE**

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On 2/28/2025, I did cause a copy of the following document(s), described below:

Modified Ch 13 Plan, Notice of Confirmation Hearing, and Memorandum

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing matrix exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of Stretto, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R. Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein. Said mailing matrix was downloaded from the District of Minnesota Bankruptcy Court's official court matrix on 2/28/2025.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 2/28/2025

/s/ Amanda M. Rosback  
Amanda M. Rosback  
Bar No. 0399772  
LifeBack Law Firm, PA  
13 7th Avenue South  
Saint Cloud MN 56301-0000  
320-252-0330  
amanda@lifebacklaw.com

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re:	Case No. 22-41874
Shanna Jeannine Richter	Chapter 13
David Michael Richter	
Debtor(s)	

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**CERTIFICATE OF SERVICE DECLARATION OF MAILING**

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On 2/28/2025, I did cause a copy of the following document(s), described below:

Modified Ch 13 Plan, Notice of Confirmation Hearing, and Memorandum

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing matrix exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document (s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 2/28/2025



Melissa Membrino  
c/o Stretto  
410 Exchange Ste 100  
Irvine, CA 92602  
(949) 222-1212  
[declaration@stretto.com](mailto:declaration@stretto.com)

I certify that on 2/28/2025, I caused a copy of the Modified Ch 13 Plan, Notice of Confirmaiton Hearing and and Memorandum to be served by First Class United States Mail service, with adequate postage to ensure delivery to:

## EXHIBIT

Minnesota Department of Revenue		Bankruptcy Section	PO Box 64447	St Paul MN 55164-0447
Oliphant Financial, LLC		Bass & Associates P.C.	3936 E. Ft. Lowell Rd., Suite #200	Tucson AZ 85712-1083
TruStone Financial Credit Union		c/o Stewart Zlmen & Jungers Ltd	2860 Patton Road	Roseville MN 55113-1100
U.S. Bank National Association		14841 Dallas Parkway, Suite 425		Dallas TX 75254-8067
U.S. Bank National Association		4500 Park Glen Road	Suite 300	Minneapolis MN 55416-4891
United States Attorney		600 US Courthouse	300 S 4th St	Minneapolis MN 55415-3070
Minneapolis		301 Diana E. Murphy U.S. Courthouse	300 South Fourth Street	Minneapolis MN 55415-1320
Affirm		Attn: Bankruptcy	30 Isabella St. Floor 4	Pittsburgh PA 15212-5862
Allina Collection Department		2925 Chicago Ave		Minneapolis MN 55407-1321
American Accounts & Advisers		Attn: Bankruptcy	Po Box 250	Cottage Grove MN 55016-0250
American Acoounts & Advisers		7460 80th St S		Cottage Grove MN 55016-3007
Capital One		Attn: Bankruptcy	Po Box 30285	Salt Lake City UT 84130-0285
Capital One		Attn: Bnakruptcy	P.O. Box 30285	Salt Lake City UT 84130-0285
Capital One N.A.		by American InfoSource as agent	PO Box 71083	Charlotte NC 28272-1083
Comenity Bank/Maurices		Attn: Bankruptcy	Po Box 182125	Columbus OH 43218-2125
Comenity Bank/Victoria Secret		Attn: Bankruptcy	Po Box 182125	Columbus OH 43218-2125
ComenityBank/Venus		Attn: Bankruptcy	Po Box 182125	Columbus OH 43218-2125
CONTINENTAL FINANCE COMPANY		PO BOX 3220		BUFFALO NY 14240-3220
Credit One Bank		Attn: Bankruptcy Department	Po Box 98873	Las Vegas NV 89193-8873
Fingerhut		Attn: Bankruptcy	6250 Ridgewood Road	Saint Cloud MN 56303-0820
FIRST SAVINGS BANK		ATTN BANKRUPTCY	1500 S HIGHLINE AVE	SIOUX FALLS SD 57110-1003
Ford Motor Credit Company LLC		4515 N. Santa Fe Ave. Dept. APS		Oklahoma City OK 73118-7901
FREEDOM FINANCIAL ASSET MANAGEMENT LLC		ATTN BANKRUPTCY DEPARTMENT	PO BOX 2340	PHOENIX AZ 85002-2340
Genesis FS Card Services		Attn: Bankruptcy	Po Box 4477	Beaverton OR 97076-4401
Ginny's		c/o Creditors Bankruptcy Service	P.O. Box 800849	Dallas TX 75380-0849
Ginnys/Swiss Colony Inc		Attn: Credit Department	Po Box 2825	Monroe WI 53566-8025
Guidance Res/US Bk		Attn: Bankruptcy	800 Nicollet Mall	Minneapolis MN 55402-7000
Internal Revenue Service		Centralized Insolvency	PO Box 7346	Philadelphia PA 19101-7346
JEFFERSON CAPITAL SYSTEMS LLC		PO BOX 7999		SAINT CLOUD MN 56302-7999
Kohls/Capital One		Attn: Credit Administrator	Po Box 3043	Milwaukee WI 53201-3043
LVNV Funding, LLC		Resurgent Capital Services	PO Box 10587	Greenville SC 29603-0587
Lincoln Automotive Fin		Attn: Bankrutcy	Po Box 54200	Omaha NE 68154-8000
MN Dept of Revenue		Attn: Denise Jones	PO Box 64447	Saint Paul MN 55164-0447

Massey's			P.O. Box 2822		Monroe WI 53566-8022
Massey's			c/o Creditors Bankruptcy Service	P.O. Box 800849	Dallas TX 75380-0849
MISSION LANE LLC			PO BOX 105286		ATLANTA GA 30348-5286
Oliphant Financial, LLC.			Bass & Associates, P.C.	3936 E. Ft. Lowell Rd., Suite 200	Tucson AZ 85712-1083
Quantum3 Group LLC as agent for			Comenity Bank	PO Box 788	Kirkland WA 98083-0788
Quantum3 Group LLC as agent for			Genesis FS Card Services Inc	PO Box 788	Kirkland WA 98083-0788
RELIANCE RECOVERIES		ATTN ACCOUNTS RECEIVABLE SERVICES	6160 SUMMIT DR N	SUITE 440	BROOKLYN CENTER MN 55430-2149
Synco/venmo			Attn: Bankruptcy	P.O. Box 965015	Orlando FL 32896-5015
Synco/walmart			PO BOX 965024		Orlando FL 32896-5024
Synchrony Bank/Care Credit			Attn: Bankruptcy Dept	Po Box 965064	Orlando FL 32896-5064
Synchrony/PayPal Credit			Attn: Bankruptcy	Po Box 965060	Orlando FL 32896-5060
Teacher Federal Cred U/TruStone Financia			Attn: Bankruptcy	14601 27th Ave N Suite 104	Plymouth MN 55447-4834
TruStone Financial Credit Union			14601 27th Ave N #104		Plymouth MN 55447-4834
US BANK			PO BOX 5229		CINCINNATI OH 45201-5229
UPGRADE INC			2 N CENTRAL AVE	10TH FLOOR	PHOENIX AZ 85004-4422
Upstart Finance			Attn: Bankruptcy	Po Box 1503	San Carlos CA 94070-7503
Upstart Network, Inc			PO BOX 1931		Burlingame CA 94011-1931
XCEL ENERGY			ATTN ATTN BANKRUPTCY DEPARTMENT	PO BOX 9477	MINNEAPOLIS MN 55484-0001
Amanda M. Rosback			LifeBack Law Firm, PA	13 -7th Avenue South	Saint Cloud MN 56301-4259
Bonial Suri			U.S. Bank National Association	14841 Dallas Parkway, Suite 350	Dallas TX 75254-7685
David Michael Richter			1321 23rd Street SE		Saint Cloud MN 56304-8608
Kyle Carlson			Chapter 13 Trustee	PO Box 519	Barnesville MN 56514-0519
Shanna Jeannine Richter			1321 23rd Street SE		Saint Cloud MN 56304-8608